

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
)	
Defendant.)	
)	
_____)	

**SPECIAL MASTER’S STATUS REPORT REGARDING
OBJECTIONS TO PROPOSED SALE PROCEDURES ORDER**

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Counsel for Special Master Robert B. Pincus

Pursuant to the Court's Oral Order dated November 4, 2021 (D.I. 387), the Special Master hereby submits this report in advance of the hearing scheduled for November 8, 2021 (the "**Hearing**") regarding the status of the objections to the *Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master's Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master, and (D) Regarding Related Matters* (D.I. 302) (as revised on September 10, 2021 by the *Response of Special Master to Objections to Proposed Sale Procedures Order* (D.I. 341-1), the "**Proposed Sale Procedures Order**").¹

As the Court and each of the Sale Process Parties are aware, since the filing of the Proposed Sale Procedure Order, my Advisors and I have continued to engage with the Sale Process Parties in an attempt to narrow the issues for the Court's consideration at the Hearing. This process remains ongoing and the Special Master anticipates that it will continue into the weekend. I anticipate that we will be in a position to file a further revised Proposed Sale Procedures Order by Sunday, November 7, 2021, as early in the day as is practicable, which my Advisors and I expect will further narrow the issues for the Court's consideration at the Hearing. The Special Master will preview the changes with the Sale Process Parties prior to filing the revised Proposed Sale Procedure Order this weekend.²

¹ Capitalized terms used but not defined herein have the meaning ascribed thereto in the *Special Master's Report and Recommendation Regarding Proposed Sale Procedures Order* (D.I. 303).

² We anticipate the amount of textual changes to be minimal. However, recognizing the limited time that the Court and interested parties that are not Sale Process Parties will have to review revised Proposed Sale Procedures Order, my lead counsel, Ray C. Schrock, P.C. of Weil, Gotshal & Manges LLP will be prepared to begin the hearing with an overview of the changes in the revised Proposed Sale Procedures Order.

The table below sets forth my understanding of the status of the Objections filed by the Sale Process Parties to the Proposed Sale Procedures Order as of approximately 6:00 p.m. (ET) on November 5, 2021:

Sale Process Party (Listed Alphabetically)	Status of Objection	Objections and Replies
ConocoPhillips	1. I have conferred with ConocoPhillips and am optimistic that their objections will be resolved upon the filing of the revised Proposed Sale Procedures Order over the weekend.	(D.I. 319) (D.I. 339)
Crystallex	1. I have conferred with Crystallex and understand that their objections remain outstanding. We are working with Crystallex over the weekend to add additional language to the Proposed Sale Procedure Order that may resolve certain of those objections.	(D.I. 316) (D.I. 343)
Venezuela Parties	1. I have conferred with the Venezuela Parties and understand that their objections remain outstanding.	(D.I. 317) (D.I. 340) (D.I. 385)

I remain available at the Court's convenience should Your Honor have any questions.

/s/ Robert B. Pincus

Robert B. Pincus, in my capacity as
Special Master for the United States
District Court of Delaware

Dated: November 5, 2021
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